



Susan Crowley
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July 17, 2007

Mr. Brian Rakvica, P.E.
Nevada Division of Environmental Protection
1771 East Flamingo Road, Suite 121-A
Las Vegas, Nevada 89119

Dear Mr. Rakvica:

Subject: Tronox LLC ECA Quarterly Report – Second Quarter 2007

Pursuant to Section XIII of the Consent Agreement, signed September 5, 1996, between Nevada Division of Environmental Protection (NDEP) and Tronox LLC (Tronox), we submit the following quarterly status report for the Henderson facility's Environmental Conditions Assessment (ECA).

Activities Conducted, 04-01-07 to 06-30-07

Conceptual Site Model:

- CSM remains unchanged until additional data justifies revisions

Upgradient Investigation Results:

- March 23 – NDEP transmits comments to Tronox (no response date specified). Tronox plans to complete response to comments after submitting the Phase A Report.

Phase A - Source Area Investigation

- April – June – Data analyses and validation are complete. Report preparations are underway.
- April 5 – Tronox and ENSR met with NDEP to discuss findings of the Phase A Source Area Investigation, and to discuss proposed approaches to the Phase B scope of work. Based on risk evaluation a proposed list of SRCs to carry forward into the Phase B investigation are proposed and under discussion. Further, ENSR and Tronox discussed methods of identifying comparison levels for chemicals carried into the Phase B investigation, and procedures for evaluating the adequacy of characterization. In addition, Tronox agreed to resample 21 monitoring wells to evaluate potential analytical bias due to turbidity in comparative sampling methods.
- May 1 – Submitted Workplan for sampling the 21 monitoring wells to NDEP.
- May 2 – May 11 – ENSR conducts field work to re-sample 21 monitoring wells.
- May 8 – Telecon with NDEP
- May 30 – Tronox submits validated Phase A data, data validation memos and DVSRs to NDEP
- June 6 – Telecon with NDEP

QAPP and SOPs:

- April - June – Project-wide QAPP is in preparation, as well as Tronox-specific SOPs based on NDEP-approved BRC SOPs.

Tronox. Adding value beyond the product.

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Community Involvement Plan

- April 2 - Tronox responds to comments and submits a revised Community Involvement Plan (CIP) to NDEP.

Groundwater Capture Evaluation Work Plan

- May 30 – Submit Groundwater Capture Evaluation Work Plan as part of the Response to NDEP Comments on the Tronox Semi-annual Performance Report dated February 28, 2007.
- June 26 – NDEP submits to Tronox comments on the Groundwater Capture Evaluation Work Plan, and requests that responses be submitted by July 31, 2007.

Other

- April 15 – Tronox issued 1st Quarter - 2007 ECA Status Report to NDEP.
- May 29 – Tronox submits 1st Quarter – 2007 *Quarterly Performance Report – Perchlorate Recovery System* to NDEP.
- June – Tronox begins assembly of the *2007 Annual Performance Report for Chromium and Perchlorate*.
- June 21 – ENSR provides relational database of Phase A data in Access format to Tronox

Please note that the Tronox ECA "*Deliverable Schedule*" is attached. Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,

Susan M. Crowley
Staff Environmental Specialist

Overnight Mail

Cc: See attached document distribution list

Attachment: ECA Deliverable Schedule

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Doc Distribution



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Deliverable Schedule

Tronox Document Distribution List

Updated: 2-Apr-07

Document Name: ECA Quarterly Update

Name (Last, First)	Firm	Distribution	
		Hard	e-Copy
Croft	NDEP	X	
King	NDEP	X	
Najima	NDEP	X	
Harbour	NDEP	X	
Sous	NDEP		
Tinney	NDEP	X	
Palm	NDEP	X	
Rakvica	NDEP	X	
Pohlmann	COH	X	
Conaty	COH Counsel	X	
Durr	DAQEM		
Hunsaker	DAQEM		
Beckstead	DAQEM		
Jorgenson	DAQEM Counsel		
Mrowka	CCCP	X	
Mulroy	SNWA		
Goff	SNWA		
Liesing	SNWA		
Kaplan	EPA, Reg 9	X	
Compliance Corrdonator	NDEP		
Compliance Coordinator	DAQEM		
Public Repository	Library	X	

Name (Last, First)	Firm	Distribution	
		Hard	e-Copy
Bailey	Tronox	X	
Corbett	Tronox	X	
Elmer	Tronox	X	
Hatmaker	Tronox	X	
Reed	Tronox	X	
Hurst	Tronox Counsel	X	
Stater	Tronox	X	
Crowley	Tronox	X	
Krish	ENSR	X	
Bilodeau	ENSR	X	
Gerry	ENSR	X	
Lambeth	Veolia		
McDaniel	Veolia		
Cheung	Veolia		
Guerrero	AIG	X	
Giroux	GEI	X	
Stowers	Broadbent		
Sahu	ERM		
Crouse	BMI	X	
Erickson	Syngenta	X	
Kelly	Stauffer	X	
Sundberg	Montrose		
Gibson	Montrose	X	
Sylvia	AmPac	X	
Wilkinson	Pioneer	X	
Mack	Timet	X	
	Montrose Counsel		

ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

Tronox LLC - Henderson, Nevada

Revised: July 13, 2007

Deliverable	Date
Conceptual Site Model * KM Response to NDEP May 6, 2005 Comments * KM Response to NDEP September 6, 2005 comments	February 28, 2005 – Submitted August 31, 2005 – Submitted October 14, 2005 – Submitted Further revisions will be completed as needed following additional data collection activities
Source Area Evaluation (SAE) * Phase A Work Plan * Phase A - Source Area Investigation * Phase A - Source Area Investigation Report * Phase B – Work Plan * Phase B – Field Work * Phase B - Risk Assessment	September 30, 2005 – Conceptual approach submitted. October 3, 2005 – NDEP approved conceptual approach October 21, 2005 – Workplan schedule submitted. February 28, 2006 - Workplan submitted October 2, 2006 – Revised Workplan Submitted November 1 to December 8, 2006 – Conducted field work. May – Resampled 21 Phase A monitoring wells. August-September 2007 August-September 2007 (to be incorporated with Phase A Report) Late 2007 Mid-year 2008
Upgradient Investigation (formerly termed the Background Study) * Background Study Workplan * Tronox Response to NDEP May 6, 2005 Comments * Tronox Response to NDEP July 28, 2005 Comments and Submits Upgradient Investigation Workplan (revised Background Study Workplan) * Upgradient Investigation Workplan Addendum * Upgradient Investigation Field Work * Upgradient Investigation Report * Tronox Response to NDEP March 23, 2007 Comments	March 30, 2005 – Submitted July 22, 2005 – Submitted September 30, 2005 – Submitted October 4, 2005 errata sheets submitted February 28, 2006 – Submitted. March 13 – 24, 2006 – Conducted Field Work October 30, 2006 – Submitted to NDEP. TBD (2007)
Quality Assurance Project Plan and Standard Operating Procedures	September 30, 2006 – Submitted September 30, 2006 - Submitted
PERIODIC MONITORING AND REPORTING	
ECA Phase II Status Report (Quarterly)	July 15; October 15, 2007
Annual Combined Perchlorate and Chromium Remediation Performance Report	August 29, 2007
Quarterly Perchlorate Remediation Performance Data Submittal	March 1, May 30, and November 30, 2007